

STATE OF NORTH CAROLINA
COUNTY OF WAKE

FILED
2019 OCT 22 PM 2:55
WAKE COUNTY, N.C.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Alyssa Riggins moves for the admission *pro hac vice* of Patrick T. Lewis of the law firm Baker & Hostetler, LLP (the “Applicant”) to appear on behalf of Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting (“Legislative Defendants”) in the above-captioned matter. In support of this motion, Movant respectfully shows the court:

1. The Applicant’s statement, attached as Exhibit A, setting forth his qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 88-4.1.

2. Mr. Lewis and the law firm of Baker & Hostetler, LLP are counsel of choice for the Legislative Defendants. A statement attesting to the retention of these applicants and the law firm of Baker & Hostetler, LLP, is attached to this motion as Exhibit B.

3. Pursuant to N.C. Gen. Stat. § 88-4.1(5), as local counsel in this matter and a resident of North Carolina, Alyssa Riggins agrees to be responsible for filing the required registration statement for the Applicant with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 88-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$225.00 (\$225 per applicant) for the *pro hac vice* admission of the Applicant.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to grant this request for admission *pro hac vice* of Patrick T. Lewis of the law firm Baker & Hostetler, LLP so that she may represent the interests of the Legislative Defendants in this matter.

DATED this 22nd day of October, 2019

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

By: 

Alyssa Riggins
N.C. State Bar No. 52366
Alyssa.Riggins@ogletreedekins.com
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for the Legislative Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Trevor M. Stanley to Appear

Pro Hac Vice has been served upon all parties to this matter by electronic mail addressed as follows:

Burton Craige,
Narendra K. Ghosh
Paul E. Smith
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
bcraige@pathlaw.com

Counsel for Plaintiffs

Paul Cox
Stephanie Brennan
North Carolina Department of
Justice
114 W. Edenton St
Raleigh, NC 27603
(919) 716-6932
pcox@ncdoj.gov

*Counsel for the State Board of
Elections*

Kieran J. Shanahan
John E. Branch, III
Nathaniel J. Pencook
128 E. Hargett St. Ste. 300
Raleigh, NC 27601
kieran@shanahanlawgroup.com

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
601 Massachusetts Ave. NW
Washington, DC 20001-3761
(202) 942-5000
Stanton.jones@arnoldporter.com

Marc E. Elias
Aria C. Branch
700 13th Street NW
Washington, DC 20005-3960
(202) 654-6200
melias@perkinscoie.com

Abha Khanna
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000

Counsel for Plaintiffs

DATED this the 22nd day of October, 2019.

By: 

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**[PROPOSED] ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

This cause coming on to be heard before the undersigned on the motion of Alyssa Riggins, an attorney duly admitted to the Bar of the State of North Carolina, for the admission *pro hac vice* of Patrick T. Lewis of the law firm Baker & Hostetler, LLP, as counsel for Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in connection with this case.

IT IS THEREFORE ORDERED that Patrick T. Lewis of the law firm Baker & Hostetler, LLP, be allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Legislative Defendants in the above captioned proceeding.

This ____ day of _____, 2019.

Paul C. Ridgeway, Superior Court Judge

Joseph N. Crosswhite, Superior Court Judge

Alma L. Hinton, Superior Court Judge

Exhibit A

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**APPLICATION OF
PATRICK T. LEWIS
TO APPEAR *PRO HAC VICE***

Patrick T. Lewis ("Petitioner") respectfully provides this Court, pursuant to N.C. Gen. Stat. § 84-4.1, this application for admission *pro hac vice* so that he may represent Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a practicing attorney with the law firm of Baker & Hostetler, LLP, 127 Public Square, Suite 2000, Cleveland, Ohio 44114-1214. I was admitted to the Ohio State Bar on November 8, 2004, and I am an active member in good standing of the Ohio State Bar.

2. The Legislative Defendants have retained me to represent them in this action. Attached hereto is a signed statement from them reflecting the same pursuant to N.C. Gen. Stat. § 84-4.1(2).

3. Unless permitted to withdraw sooner by order of this Court, I will continue to represent the Legislative Defendants in this proceeding until its final determination, and with reference to all matters incident to this proceeding, agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. I am admitted to practice in the State of Ohio, a jurisdiction which grants similar out-of-state *pro hac vice* privileges to members of the Bar of North Carolina who are in good standing.

5. The Petitioner has associated with and is personally appearing in the proceeding with Alyssa Riggins (N.C. State Bar No. 52366) of the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C., who is a resident of this State and duly and legally admitted to practice in the General Court of Justice of North Carolina. Ms. Riggins has agreed to receive service on my behalf in all matters connected with these legal proceedings and in any disciplinary matter connected to these proceedings. Such service on Ms. Riggins would have the same effect as if it were personally made upon me in North Carolina.

6. I am an attorney in good standing with the State of Ohio Bar and have not been subject to any public discipline by any Court or lawyer regulatory organization and any previous *pro hac vice* admission has not been revoked.

Respectfully submitted, this 14th day of October, 2019.

BAKER & HOSTETLER, LLP

/s/ Patrick T. Lewis

Patrick T. Lewis
Ohio State Bar No. 0078314
Baker & Hostetler, LLP
127 Public Square
Suite 2000
Cleveland, Ohio 44114-1214
Phone 216-621-0200
Fax 216-696-0740

Counsel for the Legislative Defendants

Exhibit B

October 17, 2019

Kellie Z. Myers
Trial Court Administrator
10th Judicial District
North Carolina Judicial Branch
PO Box 1916, Raleigh, NC 27602
919-792-4780
Kellie.z.myers@nccourts.org

Re: Representation in *Rebecca Harper, et al. v. Representative David R. Lewis, et al.*, 19-CVS-12667

Dear Ms. Myers,

We, the Legislative Defendants—Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting—have retained Patrick T. Lewis of Baker & Hostetler, LLP, to represent us in the proceeding entitled in the above-referenced matter.


Our legal address for these purposes:

North Carolina General Assembly
Legislative Building
16 West Jones Street
Raleigh, NC 27601

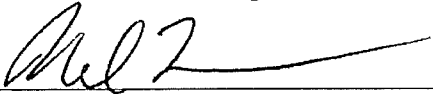
With attention line: Senator Warren Daniel (Rm. 627 LOB); Senator Paul Newton (Rm. 312 LOB); Senator Philip E. Berger (Rm. 2007 LB); Senator Ralph E. Hise, Jr. (Rm. 300-A LOB); Representative Timothy Moore (Rm. 2304 LB); or Representative David R. Lewis (Rm. 2301 LB).

Please do not hesitate to contact the aforementioned individual (Katherine L. McKnight) at (202) 861-1500 or Phillip J. Strach at (919) 787-9700 if you have any questions.

Very truly yours,



Brian Fork, General Counsel to the President Pro Tempore
of the North Carolina Senate,
on behalf of Defendants Berger and Hise



Neal Inman, General Counsel to the Speaker
of the North Carolina House of Representatives,
on behalf of Defendants Moore and Lewis

FILED

STATE OF NORTH CAROLINA
COUNTY OF WAKE

OCT 22 PM 3:00
WAKE COUNTY, N.C.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

BY _____

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Alyssa Riggins moves for the admission *pro hac vice* of E. Mark Braden of the law firm Baker & Hostetler, LLP (the “Applicant”) to appear on behalf of Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting (“Legislative Defendants”) in the above-captioned matter. In support of this motion, Movant respectfully shows the court:

1. The Applicant’s statement, attached as Exhibit A, setting forth his qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 88-4.1.

2. Mr. Braden and the law firm of Baker & Hostetler, LLP are counsel of choice for the Legislative Defendants. A statement attesting to the retention of these applicants and the law firm of Baker & Hostetler, LLP, is attached to this motion as Exhibit B.

3. Pursuant to N.C. Gen. Stat. § 88-4.1(5), as local counsel in this matter and a resident of North Carolina, Alyssa Riggins agrees to be responsible for filing the required registration statement for the Applicant with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 88-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$225.00 (\$225 per applicant) for the *pro hac vice* admission of the Applicant.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to grant this request for admission *pro hac vice* of E. Mark Braden of the law firm Baker & Hostetler, LLP so that she may represent the interests of the Legislative Defendants in this matter.

DATED this 11 day of October, 2019

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

By: 

Alyssa Riggins
N.C. State Bar No. 52366
Alyssa.Riggins@ogletreedeakins.com
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for the Legislative Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of E. Mark Braden to Appear *Pro*

Hac Vice has been served upon all parties to this matter by electronic mail addressed as follows:

Burton Craige,
Narendra K. Ghosh
Paul E. Smith
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
bcraige@pathlaw.com

Counsel for Plaintiffs

Paul Cox
Stephanie Brennan
North Carolina Department of
Justice
114 W. Edenton St
Raleigh, NC 27603
(919) 716-6932
pcox@ncdoj.gov

*Counsel for the State Board of
Elections*

Kieran J. Shanahan
John E. Branch, III
Nathaniel J. Pencook
128 E. Hargett St. Ste. 300
Raleigh, NC 27601
kieran@shanahanlawgroup.com

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
601 Massachusetts Ave. NW
Washington, DC 20001-3761
(202) 942-5000
Stanton.jones@arnoldporter.com

Marc E. Elias
Aria C. Branch
700 13th Street NW
Washington, DC 20005-3960
(202) 654-6200
melias@perkinscoie.com

Abha Khanna
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000

Counsel for Plaintiffs

DATED this the 22nd day of October, 2019.

By: 

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**[PROPOSED] ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

This cause coming on to be heard before the undersigned on the motion of Alyssa Riggins, an attorney duly admitted to the Bar of the State of North Carolina, for the admission *pro hac vice* of E. Mark Braden of the law firm Baker & Hostetler, LLP, as counsel for Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in connection with this case.

IT IS THEREFORE ORDERED that E. Mark Braden of the law firm Baker & Hostetler, LLP, be allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Legislative Defendants in the above captioned proceeding.

This ____ day of _____, 2019.

Paul C. Ridgeway, Superior Court Judge

Joseph N. Crosswhite, Superior Court Judge

Alma L. Hinton, Superior Court Judge

Exhibit A

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**APPLICATION OF
E. MARK BRADEN
TO APPEAR *PRO HAC VICE***

E. Mark Braden ("Petitioner") respectfully provides this Court, pursuant to N.C. Gen. Stat. § 84-4.1, this application for admission *pro hac vice* so that he may represent Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a practicing attorney with the law firm of Baker & Hostetler, LLP, 1050 Connecticut Ave., Suite 1100, Washington D.C. 20036. I was admitted to District of

Columbia Bar on April 8, 2002, and I am an active member in good standing of the District of Columbia Bar.

2. The Legislative Defendants have retained me to represent them in this action. Attached hereto is a signed statement from them reflecting the same pursuant to N.C. Gen. Stat. § 84-4.1(2).

3. Unless permitted to withdraw sooner by order of this Court, I will continue to represent the Legislative Defendants in this proceeding until its final determination, and with reference to all matters incident to this proceeding, agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. I am admitted to practice in the District of Columbia, a jurisdiction which grants similar out-of-state *pro hac vice* privileges to members of the Bar of North Carolina who are in good standing.

5. The Petitioner has associated with and is personally appearing in the proceeding with Alyssa Riggins (N.C. State Bar No. 52366) of the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C., who is a resident of this State and duly and legally admitted to practice in the General Court of Justice of North Carolina. Ms. Riggins has agreed to receive service on my behalf in all matters connected with these legal proceedings and in any disciplinary matter connected to these proceedings. Such service on Ms. Riggins would have the same effect as if it were personally made upon me in North Carolina.

6. I am an attorney in good standing with the District of Columbia Bar and have not been subject to any public discipline by any Court or lawyer regulatory organization and any previous *pro hac vice* admission has not been revoked.

Respectfully submitted, this 14th day of October, 2019.

BAKER & HOSTETLER, LLP

/s/ E. Mark Braden

E. Mark Braden
Washington, D.C. Bar No. 419915
Baker & Hostetler, LLP
1050 Connecticut Ave., Suite 1100
Washington, D.C. 20036
Phone 202-861-1500
Fax 202-861-1783

Counsel for the Legislative Defendants

Exhibit B

October 17, 2019

Kellie Z. Myers
Trial Court Administrator
10th Judicial District
North Carolina Judicial Branch
PO Box 1916, Raleigh, NC 27602
919-792-4780
Kellie.z.myers@nccourts.org

Re: Representation in *Rebecca Harper, et al. v. Representative David R. Lewis, et al.*, 19-CVS-12667

Dear Ms. Myers,

We, the Legislative Defendants—Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting—have retained E. Mark Braden of Baker & Hostetler, LLP, to represent us in the proceeding entitled in the above-referenced matter.

Our legal address for these purposes:

North Carolina General Assembly
Legislative Building
16 West Jones Street
Raleigh, NC 27601

With attention line: Senator Warren Daniel (Rm. 627 LOB); Senator Paul Newton (Rm. 312 LOB); Senator Philip E. Berger (Rm. 2007 LB); Senator Ralph E. Hise, Jr. (Rm. 300-A LOB); Representative Timothy Moore (Rm. 2304 LB); or Representative David R. Lewis (Rm. 2301 LB).

Please do not hesitate to contact the aforementioned individual (Katherine L. McKnight) at (202) 861-1500 or Phillip J. Strach at (919) 787-9700 if you have any questions.

Very truly yours,



Brian Fork, General Counsel to the President Pro Tempore
of the North Carolina Senate,
on behalf of Defendants Berger and Hise



Neal Inman, General Counsel to the Speaker
of the North Carolina House of Representatives,
on behalf of Defendants Moore and Lewis

FILED

STATE OF NORTH CAROLINA
COUNTY OF WAKE
OCT 22 PM 3:05
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

BY _____
REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
PRO HAC VICE**

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Alyssa Riggins moves for the admission *pro hac vice* of Katherine L. McKnight of the law firm Baker & Hostetler, LLP (the “Applicant”) to appear on behalf of Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting (“Legislative Defendants”) in the above-captioned matter. In support of this motion, Movant respectfully shows the court:

1. The Applicant’s statement, attached as Exhibit A, setting forth her qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 88-4.1.

2. Ms. McKnight and the law firm of Baker & Hostetler, LLP are counsel of choice for the Legislative Defendants. A statement attesting to the retention of these applicants and the law firm of Baker & Hostetler, LLP, is attached to this motion as Exhibit B.

3. Pursuant to N.C. Gen. Stat. § 88-4.1(5), as local counsel in this matter and a resident of North Carolina, Alyssa Riggins agrees to be responsible for filing the required registration statement for the Applicant with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 88-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$225.00 (\$225 per applicant) for the *pro hac vice* admission of the Applicant.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to grant this request for admission *pro hac vice* of Katherine L. McKnight of the law firm Baker & Hostetler, LLP so that she may represent the interests of the Legislative Defendants in this matter.

DATED this 22nd day of October, 2019

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

By: 

Alyssa Riggins
N.C. State Bar No. 52366
Alyssa.Riggins@ogletreedeakins.com
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for the Legislative Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Katherine L. McKnight to Appear *Pro Hac Vice* has been served upon all parties to this matter by electronic mail addressed as follows:

Burton Craige,
Narendra K. Ghosh
Paul E. Smith
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
bcraige@pathlaw.com

Counsel for Plaintiffs

Paul Cox
Stephanie Brennan
North Carolina Department of
Justice
114 W. Edenton St
Raleigh, NC 27603
(919) 716-6932
pcox@ncdoj.gov

*Counsel for the State Board of
Elections*

Kieran J. Shanahan
John E. Branch, III
Nathaniel J. Pencook
128 E. Hargett St. Ste. 300
Raleigh, NC 27601
kieran@shanahanlawgroup.com

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
601 Massachusetts Ave. NW
Washington, DC 20001-3761
(202) 942-5000
Stanton.jones@arnoldporter.com

Marc E. Elias
Aria C. Branch
700 13th Street NW
Washington, DC 20005-3960
(202) 654-6200
melias@perkinscoie.com

Abha Khanna
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000

Counsel for Plaintiffs

DATED this the 22nd day of October, 2019.

By: 

STATE OF NORTH CAROLINA
COUNTY OF WAKE

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

**ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

This cause coming on to be heard before the undersigned on the motion of Alyssa Riggins, an attorney duly admitted to the Bar of the State of North Carolina, for the admission *pro hac vice* of Katherine L. McKnight of the law firm Baker & Hostetler, LLP, as counsel for Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in connection with this case.

IT IS THEREFORE ORDERED that Katherine L. McKnight of the law firm Baker & Hostetler, LLP, be allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Legislative Defendants in the above captioned proceeding.

This _____ day of _____, 2019.

Paul C. Ridgeway, Superior Court Judge

Joseph N. Crosswhite, Superior Court Judge

Alma L. Hinton, Superior Court Judge

Exhibit A

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**APPLICATION OF
KATHERINE L. MCKNIGHT
TO APPEAR *PRO HAC VICE***

Katherine L. McKnight ("Petitioner") respectfully provides this Court, pursuant to N.C. Gen. Stat. § 84-4.1, this application for admission *pro hac vice* so that she may represent Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a practicing attorney with the law firm of Baker & Hostetler, LLP, 1050 Connecticut Ave., Suite 1100, Washington D.C. 20036. I was admitted to District of

Columbia Bar on May 7, 2010, and I am an active member in good standing of the District of Columbia Bar.

2. The Legislative Defendants have retained me to represent them in this action. Attached hereto is a signed statement from them reflecting the same pursuant to N.C. Gen. Stat. § 84-4.1(2).

3. Unless permitted to withdraw sooner by order of this Court, I will continue to represent the Legislative Defendants in this proceeding until its final determination, and with reference to all matters incident to this proceeding, agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. I am admitted to practice in the District of Columbia, a jurisdiction which grants similar out-of-state *pro hac vice* privileges to members of the Bar of North Carolina who are in good standing.

5. The Petitioner has associated with and is personally appearing in the proceeding with Alyssa Riggins (N.C. State Bar No. 52366) of the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C., who is a resident of this State and duly and legally admitted to practice in the General Court of Justice of North Carolina. Ms. Riggins has agreed to receive service on my behalf in all matters connected with these legal proceedings and in any disciplinary matter connected to these proceedings. Such service on Ms. Riggins would have the same effect as if it were personally made upon me in North Carolina.

6. I am an attorney in good standing with the District of Columbia Bar and have not been subject to any public discipline by any Court or lawyer regulatory organization and any previous *pro hac vice* admission has not been revoked.

Respectfully submitted, this 14th day of October, 2019.

BAKER & HOSTETLER, LLP

/s/ Katherine L. McKnight

Katherine L. McKnight
Washington, D.C. Bar No. 994456
Baker & Hostetler, LLP
1050 Connecticut Ave., Suite 1100
Washington, D.C. 20036
Phone 202-861-1500
Fax 202-861-1783

Counsel for the Legislative Defendants

Exhibit B

October 17, 2019

Kellie Z. Myers
Trial Court Administrator
10th Judicial District
North Carolina Judicial Branch
PO Box 1916, Raleigh, NC 27602
919-792-4780
Kellie.z.myers@nccourts.org

Re: Representation in *Rebecca Harper, et al. v. Representative David R. Lewis, et al.*, 19-CVS-12667

Dear Ms. Myers,

We, the Legislative Defendants— Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting—have retained Katherine L. McKnight of Baker & Hostetler, LLP, to represent us in the proceeding entitled in the above-referenced matter.

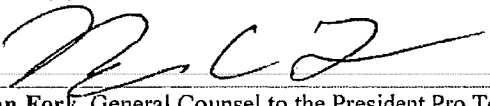
Our legal address for these purposes:

North Carolina General Assembly
Legislative Building
16 West Jones Street
Raleigh, NC 27601

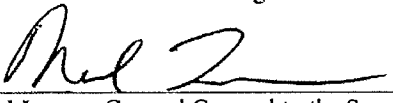
With attention line: Senator Warren Daniel (Rm. 627 LOB); Senator Paul Newton (Rm. 312 LOB); Senator Philip E. Berger (Rm. 2007 LB); Senator Ralph E. Hise, Jr. (Rm. 300-A LOB); Representative Timothy Moore (Rm. 2304 LB); or Representative David R. Lewis (Rm. 2301 LB).

Please do not hesitate to contact the aforementioned individual (Katherine L. McKnight) at (202) 861-1500 or Phillip J. Strach at (919) 787-9700 if you have any questions.

Very truly yours,



Brian Fork, General Counsel to the President Pro Tempore
of the North Carolina Senate,
on behalf of Defendants Berger and Hise



Neal Inman, General Counsel to the Speaker
of the North Carolina House of Representatives,
on behalf of Defendants Moore and Lewis

STATE OF NORTH CAROLINA
COUNTY OF WAKE

FILED

2019 OCT 22 PM 3:15

WAKE COUNTY, N.C.

BY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Alyssa Riggins moves for the admission *pro hac vice* of Trevor M. Stanley of the law firm Baker & Hostetler, LLP (the "Applicant") to appear on behalf of Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this motion, Movant respectfully shows the court:

1. The Applicant's statement, attached as Exhibit A, setting forth his qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 88-4.1.

2. Mr. Stanley and the law firm of Baker & Hostetler, LLP are counsel of choice for the Legislative Defendants. A statement attesting to the retention of these applicants and the law firm of Baker & Hostetler, LLP, is attached to this motion as Exhibit B.

3. Pursuant to N.C. Gen. Stat. § 88-4.1(5), as local counsel in this matter and a resident of North Carolina, Alyssa Riggins agrees to be responsible for filing the required registration statement for the Applicant with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 88-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$225.00 (\$225 per applicant) for the *pro hac vice* admission of the Applicant.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to grant this request for admission *pro hac vice* of Trevor M. Stanley of the law firm Baker & Hostetler, LLP so that she may represent the interests of the Legislative Defendants in this matter.

DATED this 20th day of October, 2019

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

By: _____

Alyssa Riggins
N.C. State Bar No. 52366
Alyssa.Riggins@ogletreedekins.com
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for the Legislative Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Trevor M. Stanley to Appear *Pro Hac Vice* has been served upon all parties to this matter by electronic mail addressed as follows:

Burton Craige,
Narendra K. Ghosh
Paul E. Smith
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
bcraige@pathlaw.com

Counsel for Plaintiffs

Paul Cox
Stephanie Brennan
North Carolina Department of
Justice
114 W. Edenton St
Raleigh, NC 27603
(919) 716-6932
pcox@ncdoj.gov

*Counsel for the State Board of
Elections*

Kieran J. Shanahan
John E. Branch, III
Nathaniel J. Pencook
128 E. Hargett St. Ste. 300
Raleigh, NC 27601
kieran@shanahanlawgroup.com

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
601 Massachusetts Ave. NW
Washington, DC 20001-3761
(202) 942-5000
Stanton.jones@arnoldporter.com

Marc E. Elias
Aria C. Branch
700 13th Street NW
Washington, DC 20005-3960
(202) 654-6200
melias@perkinscoie.com

Abha Khanna
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000

Counsel for Plaintiffs

DATED this the 22nd day of October, 2019.

By: 

STATE OF NORTH CAROLINA

COUNTY OF WAKE

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

No. 19-CVS-12667

**[PROPOSED] ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

This cause coming on to be heard before the undersigned on the motion of Alyssa Riggins, an attorney duly admitted to the Bar of the State of North Carolina, for the admission *pro hac vice* of Trevor M. Stanley of the law firm Baker & Hostetler, LLP, as counsel for Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in connection with this case.

IT IS THEREFORE ORDERED that Trevor M. Stanley of the law firm Baker & Hostetler, LLP, be allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Legislative Defendants in the above captioned proceeding.

This _____ day of _____, 2019.

Paul C. Ridgeway, Superior Court Judge

Joseph N. Crosswhite, Superior Court Judge

Alma L. Hinton, Superior Court Judge

Exhibit A

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**APPLICATION OF
TREVOR M. STANLEY
TO APPEAR *PRO HAC VICE***

Trevor M. Stanley ("Petitioner") respectfully provides this Court, pursuant to N.C. Gen. Stat. § 84-4.1, this application for admission *pro hac vice* so that he may represent Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a practicing attorney with the law firm of Baker & Hostetler, LLP, 1050 Connecticut Ave., Suite 1100, Washington D.C. 20036. I was admitted to District of

Columbia Bar on May 7, 2010, and I am an active member in good standing of the District of Columbia Bar.

2. The Legislative Defendants have retained me to represent them in this action. Attached hereto is a signed statement from them reflecting the same pursuant to N.C. Gen. Stat. § 84-4.1(2).

3. Unless permitted to withdraw sooner by order of this Court, I will continue to represent the Legislative Defendants in this proceeding until its final determination, and with reference to all matters incident to this proceeding, agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. I am admitted to practice in the District of Columbia, a jurisdiction which grants similar out-of-state *pro hac vice* privileges to members of the Bar of North Carolina who are in good standing.

5. The Petitioner has associated with and is personally appearing in the proceeding with Alyssa Riggins (N.C. State Bar No. 52366) of the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C., who is a resident of this State and duly and legally admitted to practice in the General Court of Justice of North Carolina. Ms. Riggins has agreed to receive service on my behalf in all matters connected with these legal proceedings and in any disciplinary matter connected to these proceedings. Such service on Ms. Riggins would have the same effect as if it were personally made upon me in North Carolina.

6. I am an attorney in good standing with the District of Columbia Bar and have not been subject to any public discipline by any Court or lawyer regulatory organization and any previous *pro hac vice* admission has not been revoked.

Respectfully submitted, this 14th day of October, 2019.

BAKER & HOSTETLER, LLP

/s/ Trevor M. Stanley

Trevor M. Stanley
Washington, D.C. Bar No. 991207
Baker & Hostetler, LLP
1050 Connecticut Ave., Suite 1100
Washington, D.C. 20036
Phone 202-861-1500
Fax 202-861-1783

Counsel for the Legislative Defendants

Exhibit B

October 17, 2019

Kellie Z. Myers
Trial Court Administrator
10th Judicial District
North Carolina Judicial Branch
PO Box 1916, Raleigh, NC 27602
919-792-4780
Kellie.z.myers@nccourts.org

Re: Representation in *Rebecca Harper, et al. v. Representative David R. Lewis, et al.*, 19-CVS-12667

Dear Ms. Myers,

We, the Legislative Defendants—Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting—have retained Trevor M. Stanley of Baker & Hostetler, LLP, to represent us in the proceeding entitled in the above-referenced matter.

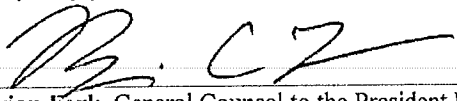
Our legal address for these purposes:

North Carolina General Assembly
Legislative Building
16 West Jones Street
Raleigh, NC 27601

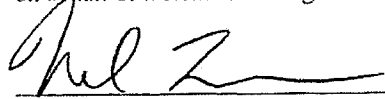
With attention line: Senator Warren Daniel (Rm. 627 LOB); Senator Paul Newton (Rm. 312 LOB); Senator Philip E. Berger (Rm. 2007 LB); Senator Ralph E. Hise, Jr. (Rm. 300-A LOB); Representative Timothy Moore (Rm. 2304 LB); or Representative David R. Lewis (Rm. 2301 LB).

Please do not hesitate to contact the aforementioned individual (Katherine L. McKnight) at (202) 861-1500 or Phillip J. Strach at (919) 787-9700 if you have any questions.

Very truly yours,



Brian Fork, General Counsel to the President Pro Tempore
of the North Carolina Senate,
on behalf of Defendants Berger and Hise



Neal Inman, General Counsel to the Speaker
of the North Carolina House of Representatives,
on behalf of Defendants Moore and Lewis

STATE OF NORTH CAROLINA
COUNTY OF WAKE

FILED
2019 OCT 22 PM 3:10
WAKE COUNTY, N.C.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

Pursuant to N.C. Gen. Stat. § 84-4.1, Movant Alyssa Riggins moves for the admission *pro hac vice* of Richard B. Raile of the law firm Baker & Hostetler, LLP (the “Applicant”) to appear on behalf of Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting (“Legislative Defendants”) in the above-captioned matter. In support of this motion, Movant respectfully shows the court:

1. The Applicant’s statement, attached as Exhibit A, setting forth his qualifications to appear in this cause pursuant to N.C. Gen. Stat. § 88-4.1.

2. Mr. Raile and the law firm of Baker & Hostetler, LLP are counsel of choice for the Legislative Defendants. A statement attesting to the retention of these applicants and the law firm of Baker & Hostetler, LLP, is attached to this motion as Exhibit B.

3. Pursuant to N.C. Gen. Stat. § 88-4.1(5), as local counsel in this matter and a resident of North Carolina, Alyssa Riggins agrees to be responsible for filing the required registration statement for the Applicant with the North Carolina State Bar. Additionally, a required fee pursuant to N.C. Gen. Stat. § 88-4.1 is being forwarded simultaneously to the Clerk of Wake County in the total amount of \$225.00 (\$225 per applicant) for the *pro hac vice* admission of the Applicant.

WHEREFORE, for the reasons set forth herein, Movant respectfully requests the Court to grant this request for admission *pro hac vice* of Richard B. Raile of the law firm Baker & Hostetler, LLP so that she may represent the interests of the Legislative Defendants in this matter.

DATED this 27 day of October, 2019

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

By: 

Alyssa Riggins
N.C. State Bar No. 52366
Alyssa.Riggins@ogletreedeakins.com
4208 Six Forks Road, Suite 1100
Raleigh, North Carolina 27609
Telephone: (919) 787-9700
Facsimile: (919) 783-9412

Counsel for the Legislative Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Richard B. Raile to Appear *Pro*

Hac Vice has been served upon all parties to this matter by electronic mail addressed as follows:

Burton Craige,
Narendra K. Ghosh
Paul E. Smith
100 Europa Dr., Suite 420
Chapel Hill, NC 27517
(919) 942-5200
bcraige@pathlaw.com

Counsel for Plaintiffs

Paul Cox
Stephanie Brennan
North Carolina Department of
Justice
114 W. Edenton St
Raleigh, NC 27603
(919) 716-6932
pcox@ncdoj.gov

*Counsel for the State Board of
Elections*

Kieran J. Shanahan
John E. Branch, III
Nathaniel J. Pencook
128 E. Hargett St. Ste. 300
Raleigh, NC 27601
kieran@shanahanlawgroup.com

R. Stanton Jones
David P. Gersch
Elisabeth S. Theodore
Daniel F. Jacobson
601 Massachusetts Ave. NW
Washington, DC 20001-3761
(202) 942-5000
Stanton.jones@arnoldporter.com

Marc E. Elias
Aria C. Branch
700 13th Street NW
Washington, DC 20005-3960
(202) 654-6200
melias@perkinscoie.com

Abha Khanna
1201 Third Avenue
Suite 4900
Seattle, WA 98101-3099
(206) 359-8000

Counsel for Plaintiffs

DATED this the 22nd day of October, 2019.

By: 

STATE OF NORTH CAROLINA

COUNTY OF WAKE

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

No. 19-CVS-12667

**[PROPOSED] ORDER GRANTING
MOTION FOR ADMISSION OF
COUNSEL TO APPEAR
*PRO HAC VICE***

This cause coming on to be heard before the undersigned on the motion of Alyssa Riggins, an attorney duly admitted to the Bar of the State of North Carolina, for the admission *pro hac vice* of Richard B. Raile of the law firm Baker & Hostetler, LLP, as counsel for Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in connection with this case.

IT IS THEREFORE ORDERED that Richard B. Raile of the law firm Baker & Hostetler, LLP, be allowed to practice in the General Court of Justice of North Carolina and appear on behalf of the Legislative Defendants in the above captioned proceeding.

This ____ day of _____, 2019.

Paul C. Ridgeway, Superior Court Judge

Joseph N. Crosswhite, Superior Court Judge

Alma L. Hinton, Superior Court Judge

Exhibit A

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
No. 19-CVS-12667

REBECCA HARPER, et al.,

Plaintiffs,

v.

REPRESENTATIVE DAVID R. LEWIS, et
al.,

Defendants.

**APPLICATION OF
RICHARD B. RAILE
TO APPEAR *PRO HAC VICE***

Richard B. Raile ("Petitioner") respectfully provides this Court, pursuant to N.C. Gen. Stat. § 84-4.1, this application for admission *pro hac vice* so that he may represent Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting ("Legislative Defendants") in the above-captioned matter. In support of this application, Petitioner certifies that:

1. I am a practicing attorney with the law firm of Baker & Hostetler, LLP, 1050 Connecticut Ave., Suite 1100, Washington D.C. 20036. I was admitted to District of

Columbia Bar on August 5, 2013, and I am an active member in good standing of the District of Columbia Bar.

2. The Legislative Defendants have retained me to represent them in this action. Attached hereto is a signed statement from them reflecting the same pursuant to N.C. Gen. Stat. § 84-4.1(2).

3. Unless permitted to withdraw sooner by order of this Court, I will continue to represent the Legislative Defendants in this proceeding until its final determination, and with reference to all matters incident to this proceeding, agree to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. I am admitted to practice in the District of Columbia, a jurisdiction which grants similar out-of-state *pro hac vice* privileges to members of the Bar of North Carolina who are in good standing.

5. The Petitioner has associated with and is personally appearing in the proceeding with Alyssa Riggins (N.C. State Bar No. 52366) of the law firm Ogletree, Deakins, Nash, Smoak & Stewart, P.C., who is a resident of this State and duly and legally admitted to practice in the General Court of Justice of North Carolina. Ms. Riggins has agreed to receive service on my behalf in all matters connected with these legal proceedings and in any disciplinary matter connected to these proceedings. Such service on Ms. Riggins would have the same effect as if it were personally made upon me in North Carolina.

6. I am an attorney in good standing with the District of Columbia Bar and have not been subject to any public discipline by any Court or lawyer regulatory organization and any previous *pro hac vice* admission has not been revoked.

Respectfully submitted, this 14th day of October, 2019.

BAKER & HOSTETLER, LLP

/s/ Richard B. Raile

Richard B. Raile
Washington, D.C. Bar No. 1015689
Baker & Hostetler, LLP
1050 Connecticut Ave., Suite 1100
Washington, D.C. 20036
Phone 202-861-1500
Fax 202-861-1783

Counsel for the Legislative Defendants

Exhibit B

October 17, 2019

Kellie Z. Myers
Trial Court Administrator
10th Judicial District
North Carolina Judicial Branch
PO Box 1916, Raleigh, NC 27602
919-792-4780
Kellie.z.myers@nccourts.org

Re: Representation in *Rebecca Harper, et al. v. Representative David R. Lewis, et al.*, 19-CVS-12667

Dear Ms. Myers,

We, the Legislative Defendants—Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate, Representative David R. Lewis, in his official capacity as Senior Chair of the House Standing Committee on Redistricting, Ralph Hise, in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting, Warren Daniel in his Official Capacity as Co-Chair of the Senate Standing Committee on Redistricting, Paul Newton in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting—have retained Richard B. Raile of Baker & Hostetler, LLP, to represent us in the proceeding entitled in the above-referenced matter.


Our legal address for these purposes:

North Carolina General Assembly
Legislative Building
16 West Jones Street
Raleigh, NC 27601

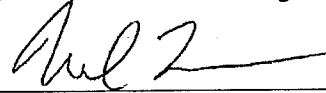
With attention line: Senator Warren Daniel (Rm. 627 LOB); Senator Paul Newton (Rm. 312 LOB); Senator Philip E. Berger (Rm. 2007 LB); Senator Ralph E. Hise, Jr. (Rm. 300-A LOB); Representative Timothy Moore (Rm. 2304 LB); or Representative David R. Lewis (Rm. 2301 LB).

Please do not hesitate to contact the aforementioned individual (Katherine L. McKnight) at (202) 861-1500 or Phillip J. Strach at (919) 787-9700 if you have any questions.

Very truly yours,



Brian Fork, General Counsel to the President Pro Tempore
of the North Carolina Senate,
on behalf of Defendants Berger and Hise



Neal Inman, General Counsel to the Speaker
of the North Carolina House of Representatives,
on behalf of Defendants Moore and Lewis